

FMC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

NO. 4:10-CR-51-1 (1)

UNITED STATES OF AMERICA)

v.)

JASMINE LITTLE)

I N D I C T M E N T

The Grand Jury charges that:

COUNT ONE

Introduction

At all times relevant to this Indictment, JP Morgan Chase was a financial services firm which provided numerous financial services for consumers including, but not limited to, student loans to college students.

School loans were applied for through JP Morgan Chase by telephone or the internet. The initial application process involved the applicant providing his name, social security number, date of birth, permanent address, email address, permanent/current telephone number, loan amount requested, repayment terms, academic start and end period, graduation date, and citizenship status.

If the applicant was approved for a loan, the applicant would complete an application kit on-line or have one mailed to him. The application kit required the applicant to submit, among other documents, a government issued identification, proof of enrollment,

and a social security card. The application kit and required documentation would typically be faxed to the JP Morgan Chase office located in Indianapolis, Indiana.

Once all of the documents were received, reviewed and approved, JP Morgan Chase would mail a check to the applicant at the address listed on the application.

CONSPIRACY

Beginning in or around June 2007, and continuing up to and including March 2008, in the Eastern District of North Carolina and elsewhere, the defendant, JASMINE LITTLE, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with other persons both known and unknown to the Grand Jury, to commit offenses against the United States, including violations of Title 18, United States Code, Section 1341 (mail fraud), in that having devised and intending to devise a scheme and artifice to defraud, and for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing, and attempting to execute, said scheme and artifice, knowingly caused to be placed in any post office and an authorized depository for mail matter, envelopes containing a check to be sent and delivered by the United States Postal Service and by any private or commercial interstate carrier, and Title 18, United States Code, Section 1343 (wire fraud), in that having devised and intending to devise a scheme and artifice

to defraud, and for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, for the purpose of executing, and attempting to execute, said scheme and artifice, did transmit and cause to be transmitted in interstate commerce, by means of wire communications, certain signs, signals, and sounds, that is, facsimile communications containing a student loan application and other documentation, including but not limited to, fraudulent billing statements, sent from the Eastern District of North Carolina, to the State of Indiana, and in furtherance thereof, did commit and cause the commission of at least one overt act in the Eastern District of North Carolina.

OBJECT OF CONSPIRACY

The object of the conspiracy was to obtain money from JP Morgan Chase by submitting fraudulent documents for student loans.

MANNER AND MEANS

Student Loan applications which contained materially false information, including but not limited to, enrollment status in a college institution, employment, billing statement, and other documents, were transferred by wire transmission in an effort to fraudulent secure student loans from JP Morgan Chase. Based on the documents submitted to JP Morgan Chase, JP Morgan Chase would mail a check in the name of the applicant to the address listed in the application. Once the applicant received the check, the applicant would cash the check knowing that the applicant was not entitled to

the money.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendants, committed and caused to be committed one or more of the following overt acts, among others:

1. In or around August 2007, the defendant, JASMINE LITTLE gave Marvin Heggie her social security number and identification card.

2. On or about August 22, 2007, a student loan application and supporting documentation in the name of JASMINE LITTLE were submitted to JP Morgan Chase requesting \$28,000.00.

3. The loan application and supporting documentation contained false information, to include but not limited to, JASMINE LITTLE's status as a student attending East Carolina University.

4. On or about August 27, 2007, JP Morgan Chase mailed a check in the name of JASMINE LITTLE in the amount of \$28,000.00, to 2332 Springhill Road, Greenville, North Carolina.

5. In or around September, 2007, JASMINE LITTLE and Marvin Heggie traveled to a check cashing facility where JASMINE LITTLE cashed the check and gave a portion of the proceeds from the check to Marvin Heggie.

All in violation of the provisions of Title 18, United States
Code, Section 371.

A TRUE BILL

FOREPERSON

Date: 6-16-10

JOHN STUART BRUCE
Acting United States Attorney

Felice McConnell Corpening
FELICE McCONNELL CORPENING
Assistant United States Attorney